## DEPOSITION OF PERSON MOST KNOWLEDGEABLE

	-							
	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		1 2	1 APPEARANCES OF COUNSEL (CONTINUED): 2 FOR THE DEFENDANT/INTERPLEADER PLAINTIFF,				
İ	EKMAN & CO. AB.,			GRAPHIC PAPER INC. (NO APPEARANCE):				
	) Plaintiff, )		3	ETTELMAN & HOCHHEISER F.C.				
	vs. )	CASE NO. 10 CV 8110	4	100 Quentin Roosevelt Boulevard Suite 401				
	GRAPHIC PAPER, INC., )		5	Garden City, New York 11530 (516) 227-6300				
	Defendants. )		6	(310) 227-0300				
	GRAPHIC PAPER, INC., )		7 8					
	Interpleader Plaintiff, )		9 10					
	vs. )		11					
	)		12					
1	EKMAN & CO. AB, and ) U.S. BANK NATIONAL ASSOCIATION, )		13					
	)		14					
1	Interpleader Defendants. )		15					
	}		16					
			17					
	DEPOSITION OF PERSON MOST I		18					
	OF PAPER MAX, INC., ' LONG BEACH, CALIFO		19					
	TUESDAY, SEPTEMBER 1		20 21					
			22					
	Reported By: Susan L. Cleveland		23					
	C.S.R. No. 10502		24					
			25					
			٦					
		1	L		3			
1	DEPOSITION OF PERSON MOST I		1	INDEX	DAGE			
2 3	OF PAPER MAX, INC., TIM SUNG, taken Defendant/Interpleader Plaintiff, U.		2 3	EXAMINATION BY: Mr. Zelmanovitz	PAGE 6			
4	Association, at Prindle, Amaro, Goet		4	Mr. Costantini	149			
5	Barnes, 310 Golden Shore, Fourth Flo		5					
6	California, at 9:19 a.m., Tuesday, & before Susan L. Cleveland, C.S.R. 10		6 7	EXHIBITS				
8	Shorthand Reporter for the State of		8	Paper Max				
9				No. Description	Page			
10 11	APPEARANCES OF COUNSEL;		9	1 Subpoena to Appear and Testify at Hearing	15			
12	FOR THE WITNESS:  GREENBERG & BASS, LLP		10	or Trial in a Civil Action	**			
	BY: JAMES R. FELTON, F	ssq.	11	2 Agreement between Great Champ Trading and	41			
13	16000 Ventura Boulevard	ı	12	Paper Max, Inc.				
14	Suite 1000 Encino, California 914	36	Γ"	3 Amendment to Agreement between Great	43			
•	(818) 382-6200		13	Champ Trading and Paper Max, Inc.	76			
15			114	4 Resolutions by Unanimous Written Consent of Board of Directors of Paper Max, Inc.	76			
16	FOR THE INTERPLEADER DEFENDANT, NATIONAL ASSOCIATION:	U.S, BANK	15		Ì			
17	WILK AUSLANDER, ILP		1	5 Affidavit of Tim Sung	78			
	BY: JOSEPH ZELMANOVITZ	, OF COUNSEL	16	6 U.S. International Trade Commission,	88			
18	1515 Broadway		17	Publication 4192, November 2010				
19	43rd Floor New York, New York 100	36	18	7 Cost Sheet	103			
	(212) 981-2300		19	8 Generalized System of Preferences, Certificate of Origin	109			
20			20					
21	FOR THE PLAINTIFF/INTERPLEADER DEPENDANT,			9 Ekman State of Account as of 8/17/2010	110			
22	DUANE MORRIS, LLP		21	10 Paper Max, Inc. Invoice 25000372	111			
	BY: ANTHONY J. COSTANTINI, ESQ.		22					
		SQ.	1	11 Paper Max, Inc. Invoice 1803; 25000382;	113			
23	KEITH GREENBERG, E		L.		•			
23	1540 Broadway	36-4086	23	25000404; 25000405; 25000412; 25000425; 25000426; and 25000448				
		36-4086		25000404; 25000405; 25000412; 25000425; 25000426; and 25000448				
23	1540 Broadway New York, New York 100	36-4086	23 24 25					
23 24	1540 Broadway New York, New York 100 (212) 692-1032	36-4086	24 25					

## DEPOSITION OF PERSON MOST KNOWLEDGEABLE

In the composition of the state of California?  In the composition of California of California?  In the composition of California?  In the composition of California?  In the composition of California of California?  In the composition of California of California?  In the composition of California of California of California?  In the composition of California of California of California of California of California?  In the composition of California of Californi	_				the second secon
2 Power Years 30 Description 31 Power Mark 32 Description 33 Power Mark 34 Description 35 Description 36 Power Mark 36 Description 37 Description 38 Power Mark 39 Description 39 Description 39 Description 39 Description 30 Description 30 Description 30 Description 30 Description 30 Description 31 Description 31 Description 32 Description 33 Description 34 Description 35 Description 36 Description 36 Description 37 Description 38 Description 39 Description 39 Description 39 Description 30 Description 30 Description 30 Description 30 Description 30 Description 30 Description 31 Description 31 Description 32 Description 33 Description 34 Description 35 Description 36 Description 36 Description 37 Description 38 Description 39 Description 39 Description 30 Descript	1	EXHIBITS (Continued)		1	that he had a family issue that had come up, so he won't
B-earl   Even   Items   Secret   Even   Devoid	2	Paper Max		2	
Bendal Exons fromcy fishalf to Boold Membery, 114  1 Devid away and shall be provided to the provided and the provided away and shall be provided away and s		No. Description Pa	age	3	
5 C Could you state your full name and address for the record, please.  5 1 1 2 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	3			!	· ·
5 13 Sever Box, Job. Levelice 3329 5 14 Pager Max, Job. Linvolce 1272 5 15 Pager Max, Job. Linvolce 1274 5 16 Pager Max, Job. Linvolce 1274 5 17 Pager Max, Job. Linvolce 1277 5 18 Pager Max, Job. Linvolce 1277 5 18 Pager Max, Job. Linvolce 1277 5 19 January May Job. Linvolce 1277 5 10 Pager Max, Job. Linvolce 1277 5 12 LINNONNERED CRESTORS 6 Pager Max, Job. Linvolce 1277 7 Pager			14		
Pages Name   N				1	
7 15 Pages Max, Inc. Invoice 1374 143 145 15 Pages Max, Inc. Invoice 1379 144 145 15 Pages Max, Inc. Invoice 1397 144 145 15 Pages Max, Inc. Invoice 1397 144 145 Pages Max, Inc. Invoice 1397 144				1	
1		· ·		7	A Tim, Tim, Sun, S-u-n-g. And address?
MH. FELL ON. The business address.  MH. FELL ON. The business address.  MH. FELL ON. The business address.  MH. Pell Clore address.  MH. Pell Clor		•		8	Q Address, please.
THE WITNESS: 222 SOUTH harbor Boulevard, Suite 11 11 11 11 11 11 11 11 11 11 11 11 11	1			9	MR. FELTON: The business address.
11 SUMANSWIRED CORSTTON 12 INAMESWIRED CORSTTON 13 Page Lane 14 96 9 14 MR. CSCTANTINII: I can barely hear the witness. 15 Information Requirement of the billion of the pitat. We hear you, Joe. 16 Information Requirement Requirement of the state of California? 19 Information Requirement Requirement Regularity and Page 1 Information Regularity Regular	1	17 Paper Max, Inc. Invoice 1297	44	10	THE WITNESS: 222 South Harbor Boulevard, Suite
12 INAMERICAN CONTENTS IN THE WITNESS AND THE WITNESS ADDRESS ADDRESS AND THE WITNESS ADDRESS	i i			11	· · · · · · · · · · · · · · · · · · ·
A Yes.  LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011  LONG BEACH, CALIFORNIA,		LIMANGGERET OF DEGATONG		1	
14 MR. COSTANTINI: I can barrely hear the witness. 15 Idon't know if there's anything that could be done to help that. We hoar you, Joo. MR. ZELMANOVITZ: Okay. We'll just ask if the witness could just raise his voice a drop. THE WITNESS: All right.  19 (Mrone.)  19 MY R.ZELMANOVITZ: Q' And rar you a permanent resident of the state of California?  10 MY Sung, that was your business address; right? 11 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 12 9:19 AM. 13 -000- 14 9:19 AM. 14 Q And are you a permanent resident of the state of California?  1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 AM. 2 9:19 AM. 2 Q Ad how do you spell that? 3 -000- 3 A Brea. 4 Q And how do you spell that? 5 A B-re-e. 6 A Pare-e. 9 WIRL ZELMANOVITZ: Q' And how do you spell that? 1 A Yes. 1 A Yes. 2 Q At which city are you a resident of? 3 A Brea. 4 Q And how do you spell that? 5 A B-re-e. 6 A Pare-e. 9 WIRL ZELMANOVITZ: Q' And how do you spell that? 5 A B-re-e. 1 MR. FELTON: Counsel, I don't believe lina's necessary. You're more than happy to serve him at our office. 1 MR. ZELMANOVITZ: Q' And was examined and testified as follows: 1 MR. ZELMANOVITZ: Q' And many to serve him at our office. 2 A Good moming, Mr. Sung. My name is Joseph and the state office. 2 A Good moming, Mr. Sung. My name is Joseph and the state of the technical boday. 3 A Gorect. 4 Q And how do you spell that? 5 A B-re-e. 6 MR. ZELMANOVITZ: Q' And how do you spell that? 6 WIRL ZELMANOVITZ: Q' And how do you spell that? 7 Was availed and testified as follows: 7 Piesses. 8 MR. FELTON: Counsel, I don't believe lina's necessary. You're more than happy to serve him at our office. 8 MR. ZELMANOVITZ: Q' And was be taking your deposition points that we have for this deposition, counsel for MR. ZELMANOVITZ: Q' And you give me the full name of Paper Max, per MR. ZELMANOVITZ: Q' And was permanent the selled as follows: 8 MR. ZELMANOVITZ: Q' And the record, John and the fire record, John and the fired yourself for the record, John and the fired yourself for the				1	
15 Idon't know if there's anything that could be done to help that. We hear you, Job.  16 MR, ZELMANOVITZ: Okay. We'll just ask if the witness could just raise his voice a drop.  18 (None.)  19 MR, ZELMANOVITZ: Q Mr. Sung, that was your business address; right? 21 Q Mr. Sung, that was your business address; right? 22 right? 23 A Correct. 24 Q And are you a permanent resident of the state of California?  1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 S:19 A.M. 2 Q At which city are you a resident of? 3 -00c- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, was examined and tuesilied as follows: 8 EXAMINATION 1 BY MR ZELMANOVITZ: 10 Q Good morning, Mr. Sung, My name is Joseph 11 MR, ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. 1 MR, FELTON: Great, I accept service. We'll accept service. We'll accept service. We'll accept service. 1 Good morning, Mr. Sung, My name of the technical obots, the whee for this deposition, coursed for looks; in Now, just to clear up some of the technical obots, the whee for this deposition, coursed for Elman & Co. AB is appearing here by telephone rom their first in the wine so. AB is appearing here by telephone conference, 19 August 19 Augus	4			1	
16 17 18 18 18 18 18 18 18 18 18 18 18 18 18	1			ļ	·
In Sundamation Regulators (None.)  In Regulators (None.)  In Regulators (None.)  In Sundamation Regulators (None.)  In Regulato	ŧ			1.5	
In the company of the control of the state of California?  In the witness could just raise his to voice a drop.  The witness could just raise his to voice a drop.  The witness could just raise his voice a drop.  The witness sald raise.  A Correct.  Q And are you a permanent resident of the state of California?  1 A Yes.  Q At which city are you a resident of?  A B-re-a.  Q And how do you spell that?  A B-re-a.  Q And how do you spell that?  A B-re-a.  Q And could you give me your residence address, please.  MR FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office.  MR ZELMANOVITZ:  Okay. What is your office, I have no problem.  MR ZELMANOVITZ:  Okay. What is your present position, your employment?  A Vice president of sales.  Which company?  A Vice president of sales.  Q Can you give me the full name of Paper Max, please.  A Paper Max.  Q Is there a corporation at the end, a Copp., an	17			1	
18 (Rione.) 18 (Rione.) 29 Witness could just raise his voice a drop. THE WITNESS: All right. 20 BY MR. ZELMANOVITZ: Q. Mr. Sung, that was your business address; right? 21 Q. Mr. Sung, that was your business address; right? 22 right? 23 A Correct. 24 Q. And are you a permanent resident of the state of California? 25 G. And are you a permanent resident of the state of California? 26 Q. And are you a resident of? 27 Q. And his city are you a resident of? 28 A. Brea. 29 A. Brea. 29 A. Brea. 30 A. Brea. 30 A. Brea. 30 A. Brea. 30 A. Brea. 31 Brea. 32 A. Brea. 31 Brea. 32 A. Brea. 33 A. Brea. 34 Brea. 35 Brea. 36 Brea. 36 Brea. 37 Brea. 38 Brea. 39	- '	INFORMATION REQUESTED		17	MR. ZELMANOVITZ: Okay. We'll just ask if the
THE WITNESS: All right.  19 THE WITNESS: All right.  20 BY MR. ZELMANOVITZ:  21 Co MR. Zelman & Correct.  22 right?  23 A Correct.  24 Q And are you a permanent resident of the state  25 of California?  26 A Ves.  27 A Ves.  28 A Ves.  29 And how do you spell that?  20 And how do you spell that?  21 A Yes.  22 Q At which city are you a resident of?  23 A Brea.  24 Q And how do you spell that?  25 A B-r-e-a.  26 Q And could you give me your residence address, please.  27 was evarrined and testified as follows:  28 BEXAMINATION  29 EXAMINATION  29 EXAMINATION  29 BY MR. ZELMANOVITZ:  20 Good moming, Mr. Sung. My name is Joseph  20 Good moming, Mr. Sung. My name is Joseph  21 MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I represent U.S. Bank, and well be taking your deposition  20 John which city are you a resident of?  30 A Brea.  41 A Yes.  42 Q And how do you spell that?  43 B-r-e-a.  44 B-r-e-a.  45 B-r-e-a.  46 B-r-e-a.  47 Win. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  48 John a Boo AB is appearing here by telephone from their  49 John a Boo AB is appearing here by telephone from their  40 Okay. What is your present position, your employment?  41 A Yes.  42 A twhich city are you a resident of?  43 B-r-e-a.  44 B-r-e-a.  45 B-r-e-a.  46 B-r-e-a.  47 B-r-e-a.  48 B-r-e-a.  49 MR. ZELMANOVITZ: Okay. If you're saying that you're say	18	-		18	
20 BY MR, ZELMANOVITZ: 21 Q Mr. Sung, that was your business address; right? 22 right? 23 A Correct. 24 Q And are you a permanent resident of the state of California?  5 I LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 2 Q And how do you spell that? 3 4 OOO- 3 A Brea. 4 Q And how do you spell that? 5 A B-r-e-a. 6 having been first duly swom, 4 B-r-e-a. 6 having been first duly swom, 4 B-r-e-a. 7 was evamined and testified as follows: 8 EXAMINATION 9 necessary. You're more than happy to serve him at our office. 9 BY MR. ZELMANOVITZ: Okay. If you're saying that 2 Definements. The following Mr. Sung. My name is Joseph 10 duly. 10 BY MR. ZELMANOVITZ: Okay. If you're saying that 2 Definements. The following Mr. Costantin? 11 MR. ZELMANOVITZ: Okay. If you're saying that 2 Definements. The following Mr. Costantin? 12 ON, just to clear up some of the technical 15 accept service. 13 Toyrosent U.S. Bank, and we'll be taking your deposition 19 Individual state we have for this deposition, counsel for 19 MR. CSTANTIN: Its Tory Costantin? 19 MR. CSTANTIN: Its Tory Costantin? 19 Mr. Costantin? 19 A Vice president of sales. 19 You want to identify yourself, Mr. Costantin? 19 A Vice president of sales. 19 MR. ZELMANOVITZ: Ckay. And for the record, 20 Which company? 19 A Paper Max, 22 Qany ou give me the full name of Paper Max, 22 Defase. 24 A Paper Max. 25 EXAMINATION 20 Great 1 the ond, a Corp., an 20 Great 1 accept service accept service. 21 A Paper Max. 26 Can you give me the full name of Paper Max, 22 Defase. 27 A Paper Max. 28 A Paper Max. 29 Can you give me the full name of Paper Max, 25 Defase. 29 Which company? 19 A Paper Max. 20 Can you give me the full name of Paper Max, 25 Defase. 20 Stepre a corporation at the end, a Corp., an 30 Can you give me the full name of Paper Max. 29 Defase.		(None.)		19	
21 Q Mr. Sung, that was your business address; right? 22 right? 23 A Correct. 24 Q And are you a permanent resident of the state of California?  5 I LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 St19 AM. 2 Q At which city are you a resident of? 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first club; sworn, 7 was examined and testified as follows: 8 EXAMINATION 9 EXAMINATION 10 BY MR. ZELMANOVITZ: 11 Q Good moming, Mr. Sung. My name is Joseph 12 Zelmanovitz. Tim of oxunse lo Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 14 today. 15 Now, just to clear up some of the technical points that we have for this deposition, counsed for effices in New York vita labelphone conference. 16 Wiff, CSTANTINI: Its Tony Costantini of Duane Mr. ZELMANOVITZ: 17 Gilloss in New York vita labelphone conference. 18 Miff, CELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office. 19 You want to identify yourself, Mr. Costantini? 20 Q And how do you spell that? 21 A Brea. 22 And could you give me your residence address, please. 23 MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office. 24 You'll accept service on his behalf at your office, I have no problem. 25 A Vice president of sales. 26 Will accept service. 27 What is your present position, your offices in who was of which represent graphic Paper who was only give me the full name of Papor Max, please. 28 Will accept service. 29 You want to identify yourself, Mr. Costantini of Duane Morts, and with me is Kelth Greenberg of our office, Who—and we will both be in on this deposition. 29 Which company? 20 Can you give me the full name of Papor Max, please. 21 A Paper Max. 22 A Paper Max. 23 I please. 24 A Paper Max. 25 A Paper Max. 26 Can you give me the full name of Papor Max, please. 27 A Paper Max. 28 A Paper Max. 29 Can you give me acceptance of Papor Max, please. 29 Can you give me the full name of Papor Max. 29 Can you giv	19			1	<del></del>
22 right? 23 A Correct. 24 Q And are you a permanent resident of the state of California?  5 I LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 3 -oOo- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, having been first duly sworn, was examined and testilled as follows: 6 A B-r-e-a. 6 Q And could you give me your residence address, please. 7 please. 8 KAMINATION 9 MR. FELITON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office. 10 Q Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I represent U.S. Bank, and well be taking your deposition today. 10 I LOday. Lot dear up some of the technical today. 10 I Loday. 10 I	20			1	
23 A Correct. 24 Q And are you a permanent resident of the state 25 of California?  1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 3OO- 4 P. S.	21			1	- · · · · · · · · · · · · · · · · · · ·
24 Q And are you a permanent resident of the state of California?  1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 2 Q Att which city are you a resident of? 3 -cOo- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 4 Pre-e. 5 A B-re-e. 6 Q And could you give me your residence address, please. 7 was examined and testified as follows: 8 EXAMINATION 9 Please. 8 MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office. 10 Q Good morning, Mr. Sung. My name is Joseph 2 Calmanowiz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 10 Loday. 11 MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. 12 Calmanowiz. I'm of counsel for plothis that we have for this deposition, counsel for Elman & Co. AB is appearing here by telephone from their offices. 15 MR. COSTANTINI: It's Tony Costantini of Duane Mrs. and we'll believe then or this deposition. 16 MR. COSTANTINI: It's Tony Costantini of Duane Mrs. and we'll believe the nor this deposition. 17 Q Can you give me your residence address, please. 18 MR. CELIMANOVITZ: Qay. If you're saying that you'll accept service on his behalf at your office, I have no problem. 19 You want to identify yourself, Mr. Costantini of Duane Mrs. ZELIMANOVITZ: Qay. What is your present position, your employment? 19 A Vice president of sales. 20 Q Can you give me the full name of Paper Max, Paper Max. 21 A Paper Max. 22 Q Can you give me the full name of Paper Max, Please. 23 A Paper Max. 24 A Paper Max. 25 Q Is there a corporation at the end, a Corp., an	22			1	~
25 of California?  1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 3 -600- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, 7 was examined and testified as follows: 9 EXAMINATION 10 BY MR. ZELMANOVITZ: 11 Q Good morning, Mr. Sung. My name is Joseph 12 Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 13 Have no problem. 14 today. 15 Mow, just to clear up some of the technical points that we have for this deposition, counsel for offices in New York via telephone conference. 16 MR. ZELMANOVITZ: 17 Q Coop Manual My name is Joseph (15 By MR. ZELMANOVITZ: 18 More, possible that we have for this deposition, counsel for offices in New York via telephone conference. 19 MR. ZELMANOVITZ: 20 More, COSTANTINI: It's Tory Costantini of Duane Morris, and with me is Keith Greenberg of our office, Manual Stem who represents Graphic Paper Max, Joshua Stem who represents Graphic Paper As ent me an e-mail, 7:32 a.m. today, to let everyone know  25 of California?  1 A Yes. 2 Q At which city are you a resident of? 3 A Brea. 4 Q And how do you spell that? 5 A Bre-a. 6 Q And could you give me your residence address, please. 7 please. 8 MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office, I make you're saying that you're file. 11 MR. ZELMANOVITZ: Okay. If you're saying that you're file. 12 You want to identify yourself, Mr. Costantini? 13 have no problem. 14 MR. ZELMANOVITZ: 15 Q Okay. What is your present position, your employment? 16 BY MR. ZELMANOVITZ: 17 Q Okay. What is your present position, your employment? 18 A Paper Max. 19 Q Is there a corporation at the end, a Corp., an	23			1	
1 LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011 2 9:19 A.M. 3 -0-Oo- 4 7 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly sworn, 7 was examined and testified as follows: 8 EXAMINATION 9 PEACH MOVITZ: 10 Q Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that your office, I have no problem. 12 Zeimanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 14 Loday. 15 Now, just to clear up some of the technical points that we have for this deposition, counsel for Elman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. 16 Morris, and with me is Keith Greenberg of our office, You want to Identify yourself, Mr. Costantini of Duane Morris, and with me is Keith Greenberg of our office, Who - and we will both be in on this deposition. 16 Joshus Stem who represents Graphic Paper A Paper Max. 17 Joshus Stem who represents Graphic Paper A Paper Max. 18 Joshus Stem who represents Graphic Paper A Paper Max. 29 Joshus Stem who represents Graphic Paper A Paper Max. 30 Joshus Stem who represents Graphic Paper A Paper Max. 40 Joshus Stem who represents Graphic Paper A Paper Max. 41 Joshus Stem who represents Graphic Paper A Paper Max. 42 Joshus Stem who represents Graphic Paper A Paper Max. 43 Joshus Stem who represents Graphic Paper A Paper Max. 44 Joshus Stem who represents Graphic Paper A Paper Max. 45 Joshus Stem who represents Graphic Paper A Paper Max. 46 Joshus Stem who represents Graphic Paper A Paper Max. 46 Joshus Stem who represents Graphic Paper A Paper Max. 47 Joshus Stem who represents Graphic Paper A Paper Max. 48 Joshus Stem who represents Graphic Paper A Paper Max. 49 Joshus Stem who represents Graphic Paper A Paper Max. 40 Joshus Stem who represents Graphic Paper A Paper Max. 40 Joshus Stem who represents Graphic Paper A Paper Max. 41 Joshus Stem who represents Graphic Paper A Paper Max. 41 Joshus Stem who represents Graphic Paper A Paper Max. 4	24			1	- · · · · · · · · · · · · · · · · · · ·
LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011  2 9:19 A.M.  3 -oOo- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, 7 was examined and testified as follows: 8 EXAMINATION 8 PYMR. ZELMANOVITZ: 10 Q Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that 12 Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 15 Now, just to clear up some of the technical points that we have for this deposition, counsel for Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini of Duane 10 MR. COSTANTINI: It's Tony Costantini of Duane 11 Morris, and will me is Keith Greenberg of our office, 12 Q Morris, and will me is Keith Greenberg of our office, 13 MR. ZELMANOVITZ: Q Will accept service. 14 A Yes. Q At which city are you a resident of? A Brea. Q And how do you spell that? A Brea. Q And could you give me your residence address, please. MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office, I MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. MR. FELTON: Great. I accept service. We'll accept service. BY MR. ZELMANOVITZ: Q Okay. What is your present position, your omployment? A Vice president of sales. Q Winch company? A Paper Max.  4 Paper Max.  4 Paper Max.  5 Sent me an e-mail, 7:32 a.m. today, to let everyone know  4 Paper Max.  5 Joshua Stem who represents Graphic Paper 24 A Paper Max. Q Is there a corporation at the end, a Corp., an	25			25	of California?
LONG BEACH, CALIFORNIA, TUESDAY, SEPTEMBER 13, 2011  2 9:19 A.M.  3 -oOo- 3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, 7 was examined and testified as follows: 8 EXAMINATION 8 PYMR. ZELMANOVITZ: 10 Q Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that 12 Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today. 15 Now, just to clear up some of the technical points that we have for this deposition, counsel for Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini of Duane 10 MR. COSTANTINI: It's Tony Costantini of Duane 11 Morris, and will me is Keith Greenberg of our office, 12 Q Morris, and will me is Keith Greenberg of our office, 13 MR. ZELMANOVITZ: Q Will accept service. 14 A Yes. Q At which city are you a resident of? A Brea. Q And how do you spell that? A Brea. Q And could you give me your residence address, please. MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office, I MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. MR. FELTON: Great. I accept service. We'll accept service. BY MR. ZELMANOVITZ: Q Okay. What is your present position, your omployment? A Vice president of sales. Q Winch company? A Paper Max.  4 Paper Max.  4 Paper Max.  5 Sent me an e-mail, 7:32 a.m. today, to let everyone know  4 Paper Max.  5 Joshua Stem who represents Graphic Paper 24 A Paper Max. Q Is there a corporation at the end, a Corp., an	1		-		7
2 9:19 A.M. 3 -OOo- 4 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, 7 was examined and testified as follows: 8 EXAMINATION 9 Please. 10 BY MR. ZELMANOVITZ: 11 Q Good moming, Mr. Sung. My name is Joseph 12 Zelmanovitz. I'm of counsel to Wilk Auslander. We 12 represent U.S. Bank, and we'll be taking your deposition 13 have no problem. 14 today. 15 Now, just to clear up some of the technical 16 points that we have for this deposition, counsel for 17 Ekman & Co. AB is appearing here by telephone from their 18 offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini of Duane 19 Morris, and with me is Keith Greenberg of our office, 10 Morris, and with me is Keith Greenberg of our office, 21 MR. ZELMANOVITZ: 22 Q Chan who represent Scraphic Paper 24 A Paper Max. 25 Q Is there a corporation at the end, a Corp., an			5	_	
3 A Brea. 4 Q And how do you spell that? 5 TIM SUNG, 6 having been first duly swom, 7 was examined and testified as follows: 8 EXAMINATION 9 necessary. You're more than happy to serve him at our office. 10 Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. 12 Zelmanovitz. I'm of counset lo Wilk Austander. We represent U.S. Bank, and we'll be taking your deposition today. 13 Now, just to clear up some of the technical 15 accept service. 16 points that we have for this deposition, counset for 16 BY MR. ZELMANOVITZ: 17 Q Okay. What is your present position, your office, I have no problem. 18 offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini? 10 Morris, and with me is Keith Greenberg of our office, I have no problem. 11 A Vice president of sales. 12 Q Okay. What is your present position, your employment? 13 A Vice president of sales. 14 A Vice president of sales. 15 A Vice president of sales. 16 Q And how do you spell that? 17 Q Okay. What is your present position, your employment? 18 A Vice president of sales. 19 Q Can you give me your residence address, please. 20 Q Which company? 21 A Paper Max. 22 Q Can you give me the full name of Paper Max, please. 23 MR. ZELMANOVITZ: Okay. And for the record, 23 please. 24 Joshua Stem who represents Graphic Paper 24 A Paper Max. 25 Q Is there a corporation at the end, a Corp., an			2011	1	
4 Q And how do you spell that?  5 TIM SUNG, 6 having been first duly sworn, 7 was examined and testified as follows: 8 PEXAMINATION 9 EXAMINATION 10 BY MR. ZELMANOVITZ: 11 Q Good morning, Mr. Sung. My name is Joseph 12 Zelmanovitz. I'm of counsel to Wilk Auslander. We 13 represent U.S. Bank, and we'll be taking your deposition 14 today. 15 Now, just to clear up some of the technical 16 points that we have for this deposition, counsel for 17 Ekman & Co. AB is appearing here by telephone from their 18 Offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantin' of Duane 19 Morris, and will be is Keith Greenberg of our office, 10 Morris, and will me is Keith Greenberg of our office, 21 A Paper Max. 22 Who- and we will both be in on this deposition. 23 MR. ZELMANOVITZ: Okay. If you're saying that 24 you'll accept service on his behalf at your office, I 25 have no problem. 26 MR. FELTON: Great. I accept service. We'll 27 accept service. 28 MR. FELTON: Great. I accept service. We'll 28 accept service. 29 You want to identify yourself, Mr. Costantin'? 20 Okay. What is your present position, your 21 employment? 22 Q Cany our office, 23 Please. 24 A Paper Max. 25 Q Is there a corporation at the end, a Corp., an		9:19 A.M.		2	Q At which city are you a resident of?
TIM SUNG, having been first duly swom, was examined and testified as follows:  EXAMINATION  BY MR. ZELMANOVITZ: C Good moming, Mr. Sung. My name is Joseph Zelmanovitz. I'm of counsel to Wilk Austander. We represent U.S. Bank, and we'll be taking your deposition today.  Now, just to clear up some of the technical points that we have for this deposition, counsel for Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. You want to identify ocurself, Mr. Costantini? MR. COSTANTINI: It's Tony Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane MR. CELMANOVITZ: A Paper Max. C And could you give me your residence address, please. MR. FELTON: Counsel, I don't believe that's please. MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. MR. FELTON: Great. I accept service. We'll accept service. MR. ZELMANOVITZ: C Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. You want to identify ocurself, Mr. Costantini?  MR. COSTANTINI: It's Tony Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane MR. ZELMANOVITZ: Okay. And for the record, MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper A Paper Max.  Q Can you give me the full name of Paper Max, Paper Max. Q Is there a corporation at the end, a Corp., an	3	-000-		3	A Brea.
having been first duly sworn, was examined and testified as follows:  EXAMINATION  EXAMINATION  BY MR. ZELMANOVITZ:  Q Good morning, Mr. Sung. My name is Joseph  Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition  today.  Now, just to clear up some of the technical points that we have for this deposition, counsel for  Kiman & Co. AB is appearing here by telephone from their offices in New York via telephone conference.  MR. COSTANTINI: It's Tony Costantini?  Moris, and with me is Keith Greenberg of our office, MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office.  MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office.  MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office.  MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Counsel, I don't salies. BY MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Counsel, I don't salies. BY MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem. BY MR. FELTON: Coalantin of the technical accept service on his behalf at your office, I A Paper Max. Q Can you give me the full name of Paper Max. Q Is there a corporation at the end, a Corp., an	4			4	Q And how do you spell that?
was examined and testified as follows:    Polease   R. FELTON: Counsel, I don't believe that's	5	TIM SUNG,		5	A B-r-e-a.
was examined and testified as follows:  8	6	having been first duly sworn,		6	Q And could you give me your residence address.
MR. FELTON: Counsel, I don't believe that's necessary. You're more than happy to serve him at our office.  BY MR. ZELMANOVITZ: 10 office.  Q Good morning, Mr. Sung. My name is Joseph 11 MR. ZELMANOVITZ: Okay. If you're saying that you'll accept service on his behalf at your office, I have no problem.  Loday. 14 MR. FELTON: Great. I accept service. We'll accept service on his behalf at your office, Wh. FELTON: Great. I accept service. We'll accept service on his behalf at your office. We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service on his behalf at your office, We'll accept service.  BY MR. ZELMANOV	7			7	_
EXAMINATION  BY MR. ZELMANOVITZ:  Q Good morning, Mr. Sung. My name is Joseph  Zelmanovitz. I'm of counsel to Wilk Auslander. We  It day.  Now, just to clear up some of the technical  Points that we have for this deposition, counsel for  Kiman & Co. AB is appearing here by telephone from their  offices in New York via telephone conference.  You want to identify yourself, Mr. Costantini?  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office,  MR. ZELMANOVITZ: Okay. If you're saying that  you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Great. I accept service. We'll  accept service.  BY MR. ZELMANOVITZ:  Q Okay. What is your present position, your  employment?  A Vice president of sales.  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office, who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record, Joshua Stem who represents Graphic Paper  A Paper Max.  Q Can you give me the full name of Paper Max, please.  A Paper Max.  Q Is there a corporation at the end, a Corp., an	8			!	•
BY MR. ZELMANOVITZ:  Q Good morning, Mr. Sung. My name is Joseph  Zelmanovitz. I'm of counsel to Wilk Auslander. We  represent U.S. Bank, and we'll be taking your deposition  today.  Now, just to clear up some of the technical  points that we have for this deposition, counsel for  Ekman & Co. AB is appearing here by telephone from their  offices in New York via telephone conference.  You want to identify yourself, Mr. Costantini?  MR. ZELMANOVITZ: Okay. If you're saying that  you'll accept service on his behalf at your office, I have no problem.  MR. FELTON: Great. I accept service. We'll  accept service.  BY MR. ZELMANOVITZ:  Q Okay. What is your present position, your  employment?  Q Okay. What is your present position, your  employment?  A Vice president of sales.  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office,  who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record,  Joshua Stern who represents Graphic Paper  A Paper Max.  Q Is there a corporation at the end, a Corp., an	1	FXAMNATION		ļ	
AR. ZELMANOVITZ: Okay. If you're saying that Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today.  Now, just to clear up some of the technical points that we have for this deposition, counsel for Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. You want to identify yourself, Mr. Costantini? MR. ZELMANOVITZ: BY MR. ZELMANOVITZ:  Q Okay. What is your present position, your employment?  A Vice president of sales.  MR. COSTANTINI: It's Tony Costantini of Duane Morris, and with me is Keith Greenberg of our office, Who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper  A Paper Max.  Q Is there a corporation at the end, a Corp., an	_			l	
Zelmanovitz. I'm of counsel to Wilk Auslander. We represent U.S. Bank, and we'll be taking your deposition today.  Now, just to clear up some of the technical points that we have for this deposition, counsel for Riman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. You want to identify yourself, Mr. Costantini? MR. COSTANTINI: It's Tony Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane MR. CELMANOVITZ:  Q Okay. What is your present position, your employment?  You want to identify yourself, Mr. Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane MR. COSTANTINI: It's Tony Costantini of Duane Mris, and with me is Keith Greenberg of our office, who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Sent me an e-mail, 7:32 a.m. today, to let everyone know				1	
have no problem.  have no prob	11			ı	
14 today.  15 Now, just to clear up some of the technical 16 points that we have for this deposition, counsel for 17 Ekman & Co. AB is appearing here by telephone from their 18 offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini? 19 A Vice president of sales. 10 Which company? 11 Morris, and with me is Keith Greenberg of our office, 12 who and we will both be in on this deposition. 13 MR. ZELMANOVITZ: Okay. And for the record, 14 Joshua Stern who represents Graphic Paper 15 accept service. 16 BY MR. ZELMANOVITZ: 17 Q Okay. What is your present position, your employment? 18 employment? 19 A Vice president of sales. 20 Q Which company? 21 A Paper Max. 22 Q Can you give me the full name of Paper Max, 23 please. 24 A Paper Max. 25 Sent me an e-mail, 7:32 a.m. today, to let everyone know 26 Is there a corporation at the end, a Corp., an	12			ı	you'll accept service on his behalf at your office, I
Now, just to clear up some of the technical points that we have for this deposition, counsel for kman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. You want to identify yourself, Mr. Costantini? Morris, and with me is Keith Greenberg of our office, who and we will both be in on this deposition. MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper Sent me an e-mail, 7:32 a.m. today, to let everyone know  15 accept service. 16 BY MR. ZELMANOVITZ: Q Okay. What is your present position, your employment? 18 employment? 19 A Vice president of sales. Q Which company? A Paper Max. Q Can you give me the full name of Paper Max, please. 24 A Paper Max. Q Is there a corporation at the end, a Corp., an	13	represent U.S. Bank, and we'll be taking your deposition		13	have no problem.
15 Accept service. 16 points that we have for this deposition, counsel for 17 Ekman & Co. AB is appearing here by telephone from their 18 offices in New York via telephone conference. 19 You want to identify yourself, Mr. Costantini? 19 A Vice president of sales. 10 MR. COSTANTINI: It's Tony Costantini of Duane 10 Morris, and with me is Keith Greenberg of our office, 11 A Paper Max. 12 Who and we will both be in on this deposition. 13 MR. ZELMANOVITZ: Okay. And for the record, 14 Joshua Stern who represents Graphic Paper 15 Sent me an e-mail, 7:32 a.m. today, to let everyone know 16 Sent me an e-mail, 7:32 a.m. today, to let everyone know 17 Q Okay. What is your present position, your employment? 18 employment? 19 A Vice president of sales. 20 Q Which company? 21 A Paper Max. 22 Q Can you give me the full name of Paper Max, please. 23 please. 24 A Paper Max. 25 Q Is there a corporation at the end, a Corp., an	14	today.		14	MR. FELTON: Great. I accept service. We'll
points that we have for this deposition, counsel for Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference.  You want to identify yourself, Mr. Costantini?  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office, who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper Sent me an e-mail, 7:32 a.m. today, to let everyone know  16 BY MR. ZELMANOVITZ:  17 Q Okay. What is your present position, your employment?  18 employment?  19 A Vice president of sales.  Q Which company?  A Paper Max.  Q Can you give me the full name of Paper Max, please.  21 A Paper Max.  22 Q Is there a corporation at the end, a Corp., an	15	Now, just to clear up some of the technical		15	•
27 Ekman & Co. AB is appearing here by telephone from their offices in New York via telephone conference. 28 You want to identify yourself, Mr. Costantini? 29 You want to identify yourself, Mr. Costantini? 30 MR. COSTANTINI: It's Tony Costantini of Duane 31 Morris, and with me is Keith Greenberg of our office, 32 Who and we will both be in on this deposition. 33 MR. ZELMANOVITZ: Okay. And for the record, 34 Joshua Stern who represents Graphic Paper 35 Sent me an e-mail, 7:32 a.m. today, to let everyone know 36 Vice president of sales. 37 Q Which company? 38 A Paper Max. 39 Q Can you give me the full name of Paper Max, 30 please. 31 A Paper Max. 32 Q Is there a corporation at the end, a Corp., an	16	points that we have for this deposition, counsel for		l	•
offices in New York via telephone conference.  You want to identify yourself, Mr. Costantini?  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office,  who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record,  Joshua Stern who represents Graphic Paper  sent me an e-mail, 7:32 a.m. today, to let everyone know  offices in New York via telephone conference.  18 employment?  A Vice president of sales.  Q Which company?  A Paper Max.  Q Can you give me the full name of Paper Max,  please.  A Paper Max.  Q Is there a corporation at the end, a Corp., an	17				
You want to identify yourself, Mr. Costantini?  MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office,  who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record,  Joshua Stern who represents Graphic Paper  Sent me an e-mail, 7:32 a.m. today, to let everyone know  A Vice president of sales.  Q Which company?  A Paper Max.  22 Q Can you give me the full name of Paper Max,  please.  A Paper Max.  23 please.  Q Is there a corporation at the end, a Corp., an	18				
MR. COSTANTINI: It's Tony Costantini of Duane  Morris, and with me is Keith Greenberg of our office,  who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record,  Joshua Stern who represents Graphic Paper  sent me an e-mail, 7:32 a.m. today, to let everyone know  MR. COSTANTINI: It's Tony Costantini of Duane  20 Q Which company?  21 A Paper Max.  22 Q Can you give me the full name of Paper Max,  please.  24 A Paper Max.  25 Q Is there a corporation at the end, a Corp., an	19	•		1	
Morris, and with me is Keith Greenberg of our office, who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper sent me an e-mail, 7:32 a.m. today, to let everyone know  A Paper Max.  Can you give me the full name of Paper Max, please.  A Paper Max.  A Paper Max.  Q Is there a corporation at the end, a Corp., an				1	
who and we will both be in on this deposition.  MR. ZELMANOVITZ: Okay. And for the record,  Joshua Stern who represents Graphic Paper  sent me an e-mail, 7:32 a.m. today, to let everyone know  Can you give me the full name of Paper Max,  Paper Max.  Q Is there a corporation at the end, a Corp., an	20				
MR. ZELMANOVITZ: Okay. And for the record, Joshua Stern who represents Graphic Paper Sent me an e-mail, 7:32 a.m. today, to let everyone know  Gustry of give the tito fair hathout the fair hath	21	-		l	
Joshua Stern who represents Graphic Paper  24 A Paper Max.  25 Sent me an e-mail, 7:32 a.m. today, to let everyone know  6	22	who and we will both be in on this deposition.		l	Q Can you give me the full name of Paper Max,
sent me an e-mail, 7:32 a.m. today, to let everyone know 25 Q Is there a corporation at the end, a Corp., an	23	MR. ZELMANOVITZ: Okay. And for the record,		23	please.
sent me an e-mail, 7:32 a.m. today, to let everyone know 25 Q Is there a corporation at the end, a Corp., an	24	Joshua Stern who represents Graphic Paper		24	•
6	25	sent me an e-mail, 7:32 a.m. today, to let everyone know		25	·
		·			
	L. XIII				8

## DEPOSITION OF PERSON MOST KNOWLEDGEABLE

_	TEMPENDE TO THE TOTAL TO			
1	Q Paper Max?	1	A Blanco.	
2	A Well, it depends.	2	Q Xiomara Blanco?	
3	Q What does it depend on?	3	A Uh-huh.	
4	A Depending on whoever has the better	4	Q Anybody else?	
5	transportation costs.	5	A Those are the two.	
6	Q When you say who has the better transportation	6	Q Did you ever deal	
7	costs, meaning whether Paper Max has the better one or	7	MR. COSTANTINI: I want to correct you, Joe. I	
8	who?	8	think that's Rosanna Gataro that you mentioned.	
9	A If we have better ones or Great Champ has	9	MR. ZELMANOVITZ: Oh, I'm sorry. You're right.	
10	better, we check to see whoever has the better freight	10	You are right. Rosanna Gataro, yes.	
11	cost, and we use whoever has the better freight cost.	11	BY MR. ZELMANOVITZ;	
12	Q Are there any particular freight forwarding	12	Q And Xiomara Blanco; right?	
13	companies that you know, a list of freight forwarding	13	A Yes,	
14	companies that Paper Max would select from?	14	Q Anyone at Ekman AB in Sweden that you deal	
15	A We work with about three freight forwarding	15	with?	
16	companies that we check prices with.	16	A No.	
17	Q And what companies are they?	17	Q Does there come a point in time during this	
18	A We work with Port Alliance, USI, and DHL.	18	process of the ordering and the supply of the paper to	
19	Q Does Paper Max use the services of a customs	19	Graphic Paper that Paper Max takes title of the goods?	
20	broker?	20	A We don't take title of the goods.	
21	A Yes.	21	Q Never?	
22	Q And who is that?	22	A What we do is there is times where Ekman will	
23	A FedEx.	23	reconsign the product to us for the purpose of Paper Max	
24	Q And is FedEx the same customs broker that Paper	24	clearing the customs, because we have an import bond	
25	Max always uses?	25	where we can import where we could clear customs on	
	martamayo acco,		whose we early apost whose we could clear customs on	
-	57			59
1	A Yes.	1	that. But we don't have the title to the goods. They	
2	Q Do you deal with withdrawn.	2	just reconsign the goods for us for the purpose of	
3	Is there any particular individual with whom	3	clearing customs.	
4	you personally deal with at the customs broker?	4	Q So only for the purpose of clearing customs?	
5	A Yeah. I forgot the name.	5	A Correct.	
6	Q Now, when you have paper ordered by Graphic	6	Q And after it clears customs, are the goods then	
7	Paper financed by Ekman, do you have any communications	7	reconsigned back to anyone?	
8	with Ekman, and I'm using Ekman broadly, because there	8	A Reconsigned, no. I mean, once we clear the	
9	are several, you know, Ekman companies, but, generally,	9	customs, then Ekman has all the bills of lading and the	
10	you will have communication with an Ekman company?	10	original documents, where they could which they have	
11		11	the possession of the goods. We don't have the original	
12	Q And would it be the Ekman AB in Sweden or would	1.2	documents so, you know, we can't we don't have the	
13	it be Ekman company that's located in Florida?	13	title to the goods. It's Ekman's products.	
14	A The Ekman in Florida.	14	Q Now, let's talk about the price for the goods.	
15	Q Is there a person or persons in Florida that	15	When goods are ordered by Graphic Paper, who determines	
16	have you dealt with since 2009 and why don't I make	16	the price for which those goods will be at?	
17		17	A Great Champ will provide pricing and a	
18	A We deal with Rosanna at Ekman.	18	monthly pricing, and typically we'll give to Graphic and	
19		19	letting him know what the pricing for that month is.	
20		20	Q How do you receive the monthly pricing from	
21	Q Anyone else?	21	Great Champ, in what form is it?	
22		22	A It could be e-mail or it could be phone calls.	
23		23	Q And who at Great Champ issues the monthly	
24		24	pricing?	
25		25	A I don't remember. I forgot her name.	
	·		• • • • • • • • • • • • • • • • • • • •	
1357513	58	News inteller		60